UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

ANGELA THOMPSON and BRIAN THOMPSON,) CIVIL COMPLAINT	5
Plaintiffs,) CASE NO. 1:18-CV-01836	123
v.)) JUDGE DONALD C. NUGENT	99
MEDGUARD ALERT, INC., QUICK RESPONSE ALERT, INC.,) MAG. JUDGE JONATHAN D.) GREENBERG	DENIE O ORDERI Striot Julo
and LIFEWATCH INC.)) JURY DEMAND	ED: SK
Defendant.)	E SAN
STIPULATION OF DISMISSAL PURSUANT TO FRCP 41(A)(1)(i-ii)		

AND FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

Now come ANGELA THOMPSON and her husband BRIAN THOMPSON ("Plaintiffs") and MedGuard Alert, Inc. ("MedGuard"), the only Defendant not presently in default, and stipulate to the following:

WHEREAS, on August 9, 2018, Plaintiffs filed their Complaint against Defendants MedGuard, Lifewatch Inc., and Quick Response Alert, Inc. alleging various violations of consumer protection laws and asserting alter-ego liability for all three entities.

WHEREAS MedGuard denied and denies any and all liability for any matters asserted in the complaint.

WHEREAS Plaintiffs and Defendant MedGuard Alert, Inc. have engaged in substantial discovery that revealed that while MedGuard Alert, Inc. and Lifewatch Inc. had a business relationship, neither entity is or was an affiliate of Quick Response Alert, Inc.